

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MARYLAND
Baltimore

IN RE:

LAURA D. BRANCH

Chapter 13

Debtor(s)

Case No. 20-10017

OBJECTION OF NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER
TO PROPOSED CHAPTER 13 PLAN AND
CONFIRMATION THEREOF

Nationstar Mortgage LLC d/b/a Mr. Cooper and its assignees and/or successors in interest, a secured creditor in the above-entitled Bankruptcy proceeding, hereby submits the following objections to the Confirmation of the Chapter 13 Plan proposed by the Debtor(s):

1. This objecting secured creditor is the beneficiary of a trust deed on property commonly known as 9220 Samoset Road, Randallstown, MD 21133; the promissory note and deed of trust were attached to the proof of claim filed by the secured creditor.

2. The debtor(s) are due a total pre-petition arrears of \$43,859.69, comprised of monthly payments totaling \$21,781.20, prepetition fees of \$9,788.99, escrow advances of \$10,166.77, and an escrow shortage of \$2,122.73.

3. The proposed Chapter 13 plan does not provide this objecting Secured Creditor with adequate protection or adequate security, according to Sections 362 and 1325 (a) of the Code.

4. Further, the Plan is inadequately funded, in that the plan base is less than this Creditor's claim.

5. The plan does not propose to pay the Secured Creditor's entire claim as shown in its proof of claim, in that the arrears are listed in the amount of \$25,000.00 and this Creditor's claim was filed in the amount of \$43,859.69.

CONCLUSION

Any Chapter 13 Plan proposed by the Debtor(s) must provide for and eliminate the objections specified above in order to be feasible and to provide adequate protection to this objecting secured creditor. It is respectfully requested that confirmation of the Chapter 13 Plan as proposed by the Debtor(s) be denied.

WHEREFORE, secured creditor prays as follows:

1. That confirmation of the proposed Chapter 13 Plan be denied.
2. For attorney's fees and costs incurred herein.
3. For dismissal of the Chapter 13 proceeding.
4. For such other relief as this Court deems proper.

Dated: March 27, 2020

Respectfully submitted
Nationstar Mortgage LLC d/b/a Mr. Cooper

By Counsel:

/s/ Zohaib Ahmed

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CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of March, 2020 the following person(s) were served a copy of the foregoing Notice in the manner described below:

Via CM/ECF Electronic Notice

Jeffrey M. Sirody
Jeffery M. Sirody and Associates, P.A.
1777 Reisterstown Road
Suite 360 E
Baltimore, MD 21208

Debtor's Attorney

Robert S. Thomas, II
300 E Joppa Road, Suite 409
Towson, MD 21286

Chapter 13 Trustee

Via First Class Mail, Postage Prepaid:

Laura D Branch
9220 Samoset Road
Randallstown, MD 21133

Debtor(s)

/s/ Zohaib Ahmed

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